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Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, N.W.  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

CC: Docket 4d-48

**Re: Ex Parte Presentation in CC Docket No. 01-338; CC Docket No. 96-98; and CC Docket No. 98-147**

Dear Ms. Dortch:

Pursuant to Section 1.1206(b)(1) of the Commission's Rules, the signatories of this letter hereby submit this written **ex parte** presentation in the above-captioned docketed proceedings. The purpose of this presentation is to provide additional information on the issues below that were discussed at the meeting held between the parties and William Maher, Chief of the Wireline Competition Bureau and members of his staff on November 6, 2002.

1. In an ex parte dated October 30, 2002, the parties proposed a series of rules under which a carrier would migrate from UNE-P to its own switch. As part of those rules, parties suggested an eighteen (18) month period was needed for the CLEC for its initial switch, collocation and interoffice transport facilities deployment. The Bureau asked parties to provide further evidence as to why this was the appropriate time period.

Attachment A represents the detailed time-line depicting the high-level tasks required to build a switch site, establish collocation cages and establish interconnection with the ILEC. Attachment B is a print out from the Verizon Wholesale Handbook Section 6.3 that provides an in-depth discussion of the tasks identified in Attachment A. The time-line identifies intervals associated with each activity and groups actions that can be completed concurrently. Where applicable, timeframes have been provided in calendar days. These time frames are based on actual CLEC experience and published ILEC intervals.

Because of the interdependency between tasks it is imperative that key activities are completed on time. Key dependency tasks are the availability of the ILEC's entrance facility system at the CLEC's switch site, ownership of a 10,000 NXX code block and certified SS7 links.

The time-line provides an optimum case scenario and assumes that there are no major issues/set backs with any single activity. For instance, if a CLEC is faced with a code exhaust situation in a LATA, the activation of a switch could be

delayed. Currently there is a requirement that the CLEC is identified as the owner of a complete NXX code in the Local Exchange Routing Guide (LERG) in order to

establish its Local Routing Number (LRN) for its interconnection network. In order to own the code the CLEC must be assigned the entire 10,000 block which increases time frames in a code exhaust situation. An LRN permits the porting of telephone numbers from one carrier to another, thus allowing the end user to change carriers without changing their telephone number. Another example of a possible delay is the delivery of the ILEC's Entrance Facility System into the CLEC's switch site. Delays can be due to the lack of fiber facilities, build constraints, availability of equipment, etc. This delay will lengthen all network intervals because of the ILEC requirement to have the entrance facility system installed and accepted prior to the CLEC's submission of orders for its interconnection network. These are just two examples of complications that can increase the time frames associated with the deployment of a switch.

2. Describe the types of technical and operational issues that a CLEC may face when augmenting an existing network and collocation arrangements.

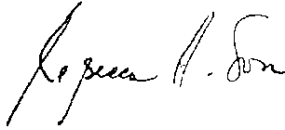
Depending on the available capacity in a given collocation cage and on its interconnection network, a CLEC may need to augment its collocation and/or interconnection network facilities from time-to-time to support new UNE-L customers. Augments fall into a number of different categories including, but not limited to, equipment, power, collocation, collocation terminations, network facilities and trunking. The intervals associated with augments frequently mirror the intervals needed to initially deploy a collocation cage and/or the interconnection network. Average intervals range from thirty (30) to one-hundred –eighty (180) days depending on the type of augment. Overall, delays are driven by some of the same reasons CLECs face when building the initial network.

3. Given the availability of switches from national vendors at uniform prices, why would the particular cost characteristics of a state or local market have any bearing on a CLEC's ability to deploy its own switch?

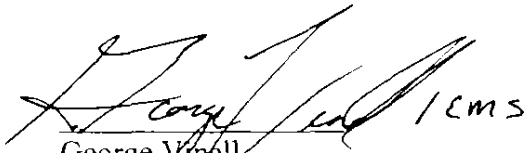
First and foremost, even if a switch were free, it is the cost characteristics of items such as real estate, transport, loops, and collocation, costs specific to each individual State, that determines the feasibility of individual CLEC network build out. Attachment C shows these various input costs from several representative States. As this table indicates, the non-recurring and recurring costs for collocation can vary by as much as 70% between states. Thus, the impairment analysis relative to the line densities required before a CLEC would not be impaired if it had to migrate from UNE-P to UNE-L must be done on an individual basis by the state public utility commissions.

Pursuant to Section 1.1206(b)(1) of the Commission's rules, an original and one copy of this letter are being submitted to the Office of the Secretary. Please associate this notification the record in the proceedings indicated above.

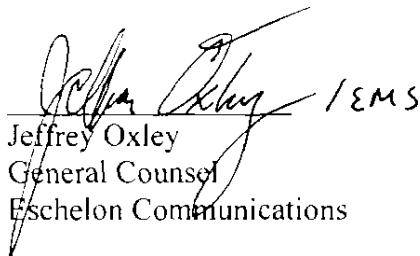
Respectfully submitted,



Rebecca M. Sommi  
Vice President, Operations Support  
Broadview Networks, Inc.



George Vinnall  
Executive Vice President - Business Development  
Talk America, Inc.



Jeffrey Oxley  
General Counsel  
Eschelon Communications

Attachments (3)

CC: William Maher  
Steve Morris  
Tom Navin  
Rob Tanner  
Richard Lerner  
Michelle Carey  
Scott Bergmann  
Qualex International

## **Attachment A**

UNE-L switch Build Time-Line	Interval Calendar Days	Cumulative	Verizon Handbook Reference	Comments
Select Switch Site	120	120	CLEC Interval	CLEC needs to find real estate to support the build-out of switch i.e. environmental, ceiling heights, etc.
Negotiate Equipment Contracts/Order Equipment	90		CLEC Interval	CLEC needs to negotiate contracts with switch and other equipment provider vendors.
Planning Meeting w/LEC	180	300	CLEC Handbook Volume 1 - 6.3.1/6.3.1.1	Set-up planning w/ the ILEC to review the location of switch site and the required facilities to support the CLEC's network for interconnection, collocation, loops.
Submit Forecasts				
Entrance Facility (OC-48 Capacity)				
<b>UNE's</b>				
Obtain Codes	60		CLEC Handbook Volume 6.3.1.2	In order to interconnect with the ILEC standard industry codes must be obtained from various organizations.
RAO (Revenue Accounting Office)				Not referenced but required on the N U application.
N U			CLEC Handbook	A CLEC must submit code requests to the North American Number Plan (NANPA) Code.
Switch CLLI/ACTL			CLEC Handbook Volume 6.3.1.2	CLLI Codes/ACTL's are required for a CLEC's switch.
Update CLEC Profile	60		CLEC Handbook Volume 1 - 8.5.7	A CLEC needs to establish itself as a facilities based carrier in the ILEC's systems in order to process orders.
Establish Electronic Interface/Connectivity for Access Service Requests (ASR)			CLEC Handbook Volume 1-6.3.3	A CLEC needs to establish the interface to submit ASR's for its interconnection network. UNE-P orders are submitted via LSR's.
Hold Pre-ASR Meeting w/LEC			CLEC Handbook Volume 1.6.3.1.16/6.3.4	ILEC reviews interconnection requirements i.e. tandems, OPS/DA, 911, SS7, IXC, etc. CLEC submit trunking forecasts.
Execute Contracts w/Vendors	90			
Host Provider (RAO) SS7/LIDB			CLEC Handbook Volume 1 - 6.3.1.4	Not referenced.
Ops/DA			CLEC Handbook Volume 1 - 6.3.1.7	CLEC's may negotiate w/ an outside vendor or with the ILEC for Operator and Directory Listing services.
Meet Point Billing			CLEC Handbook Volume 1 - 6.3.1.10	In order for a CLEC to terminate traffic to carrier's that sub-tenet the ILEC's tandems it needs to establish a meet point arrangement for the exchange of meet point billing records. The CLEC must select a billing vendor to process these records.
911 - ALI input/verification			CLEC Handbook Volume 1-6.3.1.3	CLEC may negotiate w/ an outside vendor or gain direct access to the ILEC's E911 records system i.e. PS/ALI. User ID's are required.
Alternate Billed Calls (ABC)			CLEC Handbook Volume 1-6.3.1.11/6.4.4.6	CLEC's must make arrangements for mutual billing of Alternate Billed Calls i.e. calls billed to a third party, calling card and collect calls. ILEC's may participate in industry "in region" and "out of region" clearing houses.
NPAC - Number Portability Directory Listings			CLEC Handbook Volume 1 - 6.3.1.8	A CLEC may choose to list its end users' directory information in the ILEC's telephone directories. A CLEC must complete the applicable forms to initiate the offering.
Customer Guide			CLEC Handbook Volume 1 - 6.3.1.9/8.5.4	CLEC's who want to be included in the information must make prior arrangements with the ILEC.
Interconnection Agreement w/other Local Service Providers			CLEC Handbook Volume 1 - 6.3.1.14	CLEC's may need to establish arrangements with other CLEC's/independents etc. in order to terminate traffic. A transit option is generally offered by the ILEC.
Information Service Providers, if applicable			CLEC Handbook Volume 1 - 6.4.4.6	CLEC's may want to make arrangements so their end users can directly access information service providers, such as weather services.
Build Entrance Facility System (OC-48)	180		CLEC Handbook Volume 1 - 6.3.1.16	An OC-48 system fed by fiber. In most instances the ILEC must build into the CLEC location to establish network interconnection with the ILEC.
Build Switch Site	180		CLEC Interval	Once the CLEC has secured the real estate it can move forward with the installation of equipment.
Build Collo/Install Equipment	180		CLEC Handbook Volume 1 - 6.4. Volume 1-6.4.1 of 2	CLEC's must submit applications to the ILEC and build out the collocation site. Once the site has been accepted the ILEC provides information so that the CLEC can order facilities from its switch site.
Order Facilities	60	360		

Attachment A


UNE L Switch Build Time-Line	Interval Calendar Days	Cumulative	Verizon Handbook Reference	Comments
Order A SS7 Links/Complete SS7 Certification	60	420	CLEC Handbook Volume 1 - 6.5.2	CLEC must install facilities and complete a certification process. SS7 certification must be completed prior to the submission of interconnection trunk orders.
Order Trunks/Complete Test/Acceptance	30	450	CLEC Handbook Volume 1 - 6.3.1.16/6.3.5	The handbook provides additional detail on the types of trunks that need to be established for interconnection.
Originating			CLEC Handbook Volume 1 - 6.3.1.16/6.3.5	
Terminating			CLEC Handbook Volume 1 - 6.3.1.16/6.3.5	
IXC			CLEC Handbook Volume 1 - 6.3.1.16/6.3.5	
Choke			CLEC Handbook Volume 1 - 6.3.1.16/6.3.5	
Ops/DA			CLEC Handbook Volume 1 - 6.3.1.16/6.3.5	
Operator Verification/Interrupt Trunks			CLEC Handbook Volume 1 - 6.3.1.16/6.3.5	
911	60	510	CLEC Handbook Volume 1 - 6.3.1.3	A CLEC must provide connectivity to the 911/E911 network. Facilities must be built to the selective routers. Discussions need to be held with the applicable agencies to review the CLEC's 911 plan and testing procedures. In addition, the CLEC needs to obtain access to the Master Street Access Guide to ensure end-user information is properly submitted.
Submit 911 Proposal			CLEC Handbook Volume 1 - 6.3.1.3	
Obtain MSAG			CLEC Handbook Volume 1 - 6.3.1.3	
Schedule and Test w/PSAP	30		CLEC Handbook Volume 1 - 6.3.1.3	
Turn-up network to Collo's	30			CLEC's must order facilities to collocation sites.
NXX Testing			CLEC Handbook Volume - 6.3.1.6	Testing is completed to ensure the code has been activated in the applicable switches. In some areas this process happens automatically once the CLEC provides a standard test code.
Call Testing	30	540		
Cumulative Total Days		540		
Total Switch Build Time Months:		18		

Attachment A

## **Attachment B**



## 6.3 Establish CLEC and Verizon Network Interconnections

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**I** **O**

[Verizon Wholesale](#)  
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[Support, Contacts and FAQ](#)

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This section covers the interconnection of the CLEC network with the Verizon network and provides information primarily to those CLECs wishing to interconnect switches with the Verizon network.

Two important topics that may also interest CLECs wishing to interconnect switches, the purchase of Unbundled Network Elements and Collocation, are discussed in [Section 6.4](#).

Network interconnection enables Verizon and the CLEC to originate and terminate traffic to and from each other's network. To interconnect a CLEC's network to Verizon's network, a CLEC needs to establish an Interconnection Point between its switches and the Verizon network. Verizon Interconnection Points are generally central offices and access tandems that are utilized for the exchange of local traffic to and from end users served by those switches.

A CLEC that establishes a network interconnection and plans to serve end users with its own local loop facilities from its own switches will be able to activate local service from its switches for its end users upon completion of the steps in the network interconnection process. The basic steps to establish network interconnection are:

1. Determine the Network Interconnection Point and Interoffice Trunking
2. Build and Test the Network Interconnection Point
3. Establish Electronic Interface/Connectivity for Access Service Requests (ASR) and Local Service Requests (LSR)
4. Conduct a Pre-ASR Meeting
5. Establish Interoffice Trunking for the Exchange of Traffic
6. Verify Network Build

### 6.3.1 Design the Network Interconnection Point and Interoffice Trunking

In this step, representatives from the CLEC and Verizon meet to design the Network Interconnection Point and desired interoffice trunking.

CLECs are required to provide a forecast of trunk requirements six months prior to the desired in-service date. This may require that the CLEC submit forecasts in advance of the signing of the interconnection agreement.

CLECs will need to have internally performed initial network design, including the development of forecasted volumes, and will need an understanding of the following topics:

#### 6.3.1.1 Local Access and Transport Areas

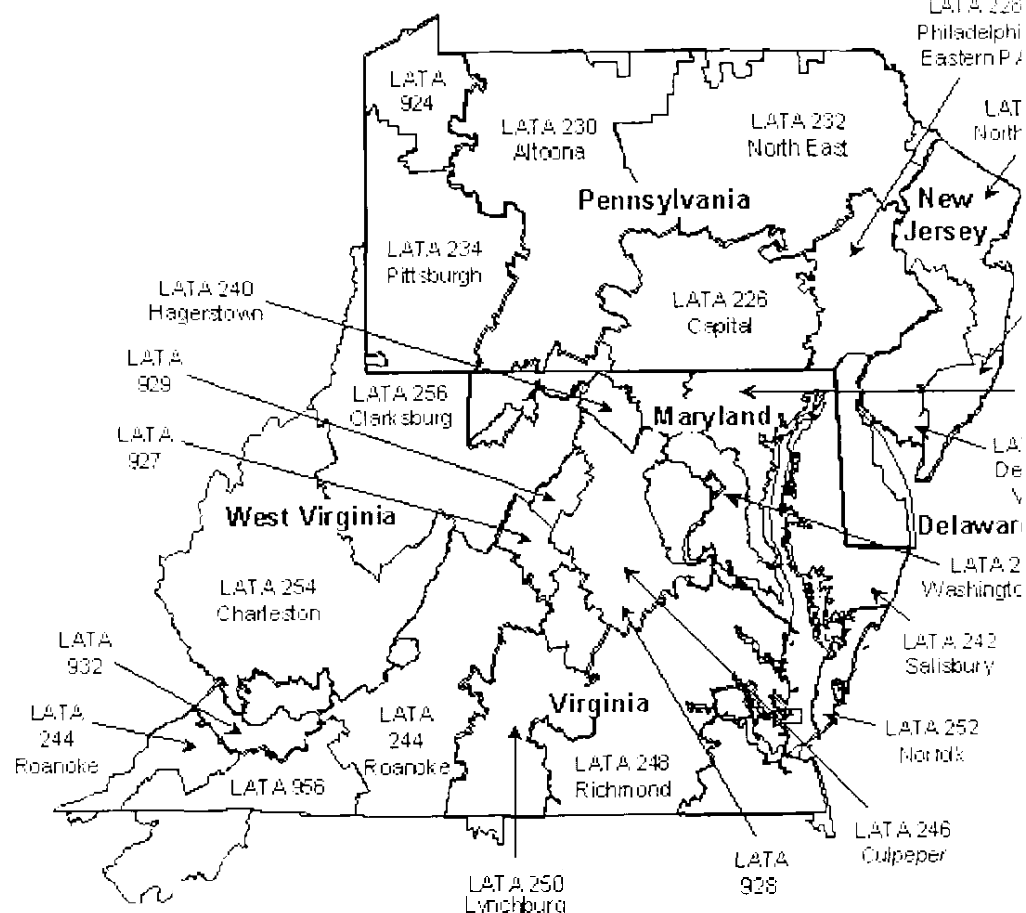
CLECs must understand the Local Access and Transport Areas (LATAs) in which the CLEC would like to connect and the locations and



descriptions of the Verizon switching equipment available in those LATAs. In order for a CLEC's local end users to be able to place and receive IntraLATA calls to and from Verizon end users, CLECs need to ensure the exchange of IntraLATA traffic across the CLEC and Verizon networks. CLECs will generally need to establish trunk groups to each Verizon Access Tandem within each LATA in which a CLEC wishes to connect. CLECs need to design their switch network interconnection points and the desired interoffice trunking to Verizon tandems and/or central offices. In addition, Verizon is required to establish interconnection trunks for Verizon traffic destined for the CLEC switch.



Figure 6.3.1: Verizon-North with LATAs  
(Connecticut includes Greenwich and Byram only)



Information regarding access tandems and central offices in each LATA within the Verizon territory is available in the Local Exchange Routing Guide (LERG), which is available from Telcordia Technologies. Changes to the LERG may be found by accessing the Telcordia Technologies web site at:  
<http://www.telcordia.com>.

The CLEC's switches must have an assigned Common Language Location Identifier (CLLI) code.

### 6.3.1.3 E911 and Public Safety Answering Points

[http://www22.verizon.com/wholesale/handbooks/section/0,,c-1-6-6\\_3,00.html](http://www22.verizon.com/wholesale/handbooks/section/0,,c-1-6-6_3,00.html)

[http://128.11.40.241/east/wholesale/customer\\_docs/e911.htm](http://128.11.40.241/east/wholesale/customer_docs/e911.htm) with the exception of NJ, which uses EDI. A CLEC must fill out an **E911** SecurID Network User ID Access Request Form to obtain a SecurID.

To obtain an **E911** SecurID Network User ID Access Request Form, please see Section 8.5.1 of this Volume.

Completed **E911** forms may be faxed to:

Debra Munsen

PS/ALI Systems Administrator

Telephone number: (617)743-3144

Fax Number: (617)342-3089

#### 6.3.1.4 Signaling System 7 (SS7)

CLECs that interconnect switches to the Verizon SS7 network will need to go through a SS7 testing and certification process performed by Verizon to ensure accurate network signaling. The certification process for local exchange carriers is different than that for interexchange carriers, so being certified as an IXC does not exempt a CLEC from this step. The general time frame for SS7 certification only is 30 business days.

Subsequent to initial interconnection to the Verizon SS7 network, CLECs will also be required to go through the SS7 testing and certification process when adding or changing point codes, installing a new switch or switch generic, and adding features such as CLASS, ISUP (call set up), LIDB, 800, AIN, LNP and other future technologies.

For more detailed descriptions of these SS7 features, please refer to Volume III, Section 3.1.

The SS7 Interconnection Information Package for Verizon is included in Section 8.5.2 of this Volume.

#### 6.3.1.5 Central Office Code (NXX) Assignment Request

The North American Numbering Plan calls for a 10-digit telephone number. The first three numbers designate the numbering plan area (NPA) (*a.k.a.* Area Code); the next three digits represent the central office code (NXX) and the last four digits complete the line number.

In order to provide CLEC switch-based CLEC end users with telephone numbers, a CLEC will need to procure NXXs within each numbering plan area (NPA) where it will have end users.

Requests for NXX Assignments should be made to the North American Numbering Plan (NANP) Code Administrator. Currently, the Code Administrator for the Verizon region is Myra Walls (410)736-6035, fax (410)736-6066.

The Central Office Code (NXX) Assignment Guidelines (including application form) are available on the Alliance for Telecom Industry Solutions (ATIS) web site, <http://www.atis.org>, under the Carrier Liaison Committee. Industry Numbering Committee, Documents.

Please note that effective January 19, 1998, Numbering Plan Administration was transferred from Telcordia Technologies to Lockheed Martin in Washington D.C. For more information, contact Lockheed Martin at (202) 756-5782, fax (202) 887-0331.

More information on numbering resources/assignments administered by the North American Numbering Plan Administration (NANPA) can be found on NANPA's web site at <http://www.nanpa.com>. The information currently provided on their site is as follows:

- Area Codes
  - NPA Relief Activities
  - ANI II Digits
- Carrier Identification Codes
  - N11 Codes
  - Non-dialable Toll Points
  - Vertical Service Codes
- 456 Codes
  - 500-NXX Codes
  - 555-Line Numbers
  - 800-855 Line Numbers
  - 900-NXX Codes

#### **6.3.1.6 NXX Testing**

Verizon will perform testing for new NXXs on an automated basis or on a per request basis via the Verification and Evaluation Testing System (VETS). VETS can test new NXXs that a CLEC will be opening in Verizon-North on an automated basis provided we receive the following information and that the CLEC adheres to the procedure designated below.

Verizon requires that the CLEC establish a standard test number for use in each new NXX that it opens. That four-digit standard test number may be chosen by the CLEC. However, that test number must remain identical for every NXX the CLEC opens in Verizon-North. By way of example, when the CLEC provides Verizon with the standard test number of XXX-5656, the same four digit numbers (5656) must be the first number the CLEC opens for every NXX. That test number in each new NXX must be opened as soon as the CLEC requests the NXX code opening (e.g., New NXX ordered: 345, Test number opened: 345-5656). Secondly, this test must be set to 1000 cycle Hz tone, which will enable the VETS tests initiation to flow through the systems without any manual intervention

The CLEC should send its Verizon Account Manager the four-digit standard test number it would like to use and note whether or not it will be set to 1000 Hz tone. Test numbers not set to 1000 cycle Hz tone will require manual intervention on the part of both Verizon and the CLEC. The CLEC's reply should contain the following format:

(CLEC) XXX-6789 1000 cycle  
XXX-2121 Not 1000 cycle

On a per request basis, CLECs may request this test via a "VETS Special Test Request." The testing of central office codes is performed whenever there is a scheduled introduction of new NXXs to the network. The VETS testing will be performed only in central offices that are VETS capable.

This VETS test request form (Verizon-North) is contained in Section 8 5 3 of this Volume

Verizon-South does not use a comparable form or procedure for NXX testing. Instead, each central office is responsible for testing new NXXs

when implemented. Problems with NXXs are reported by Verizon after the fact to Equipment Billing Access Control (EBAC).

### **6.3.1.7 Operator Services and Directory Assistance (OS/DA)**

As a CLEC designs its network, it needs to care for the routing and handling of Operator Services calls (e.g., CLEC end user dials 0 or 0 + telephone number), and the routing and handling of Directory Assistance calls (e.g., CLEC end user dials 411 or 555-1212).

Subject to local switch capabilities, Verizon can provide Operator Services and Directory Assistance to the CLEC. However, a CLEC with interconnected switches must care for the routing of these calls in the design of its interconnected network. The CLEC may also opt to use its own or a third party's Operator Services and/or Directory Assistance.

Verizon also offers branding options that a CLEC should consider at this point. (OS/DA is also referenced in [Section 6.4.4.3.](#))

For more information on branding options, please refer to [Volume III, Section 3.3.](#)

### **6.3.1.8 Directory Listings**

A CLEC may choose to list its end users' directory information in the Verizon telephone directories.

In order to begin offering listings in Verizon-North, the CLEC must provide certain information on a "Directory Listings Initialization Form," which is contained in the CLEC Profile Form.

The CLEC Profile Form is contained in [Section 8.5.7](#) of this Volume.

In order to begin offering listings in Verizon-South, the CLEC must provide the following information to the Account Manager:

- CLEC preferred bill period
- CLEC bill name and address
- CLEC contact name and phone number
- CLEC operating address information

The Account Manager will communicate this information to the National Market Center in order to create a Directory Billing Account for the CLEC. A Directory Billing Account Number is assigned to the CLEC, allowing the submission of DL, DSCR and DSR forms to request a listing.

For more information on the Directory Listings (DL) and Directory Service Caption Request (DSCR) forms, please see [Volume III, Section 6.9.](#) Directory Listings is also referenced in [Section 6.4.4.4](#) of this Volume.

### **6.3.1.9 Other Local Service Providers (OLSP) Listings**

CLECs operating in Verizon-North may choose to list contact information in the Verizon directories on an Other Local Service Providers (OLSP) information page.

To request a listing in the Information Pages for Verizon-North, a CLEC must submit an OLSP Information Pages Input form, listed in the Quick Reference, [Section 8.5.4](#) of this Volume.

CLECs operating in Verizon-South who wish to be listed as a Local Service Provider in the Customer Guide should contact the person listed below for an instruction packet:

Vikki Finkenbinder  
Verizon  
1347 Cheltenham Ave.  
Elkins Park, PA 19207-3191  
Phone (215) 782-2441 Fax (215) 782-9165

(OLSP Information Pages is also referenced in Section 6.4.4.5.)

#### **6.3.1.10 Meet Point Arrangements for Interexchange Carrier Traffic**

A CLEC which uses its own switch must establish Meet Point Arrangements for jointly provided access service that utilizes or subtends the Verizon tandem. The CLEC must order separate Meet Point Trunks.

Verizon participates in multiple bill/multiple tariff. Each CLEC must select a billing vendor to process Category 11 Meet Point Access Records. Verizon contracts the New York Access Billing, LLC to provide Switched Carrier Access Billing and Collection services for the entire Verizon region. The Pool also provides the billing and collection of access revenues for services jointly provided by the CLEC and Verizon.

Call records are provided to the Pool's billing service company, ACM, Inc., which processes millions of records each month to provide accurate, timely, and confidential billing services. Bills are rendered on a consistent monthly billing cycle and meet current industry billing standards for format and content. Reports are provided summarizing billed revenues by element, billed volumes and settlement distributions. The Pool receives payments, handles follow-up collection activities and carrier inquiries. Funds are distributed to the respective billing companies based upon a predetermined multiple tariff settlement process.

Verizon will send either on magnetic tape or electronic format for distribution of Category 11 records to the CLEC's billing vendor. The summary records can be received from the CLEC on magnetic tape or electronic format.

To establish Meet Point Billing arrangements. contact:

Michael Tartaglione  
Sr. Staff Consultant/Product Development  
125 High Street  
Floor 6  
Boston, MA 02110  
Phone: (617) 743-5239

To engage the services of the New York Access Billing, LLC. contact:

John Flack  
Administrator  
New York Iaccess Billing, LLC  
100 State Street  
Suite 650  
Albany, New York 12207

Phone (518) 443-2805

#### **6.3.1.11 Alternate Billed Calls (ABCs)**

CLECs interconnecting to the Verizon network must ensure that they have made arrangements for mutual billing and collecting of Alternate Billed Calls.

Examples of Alternate Billed Calls include:

- A Verizon end user makes a call from a CLEC end user's phone and charges the call to a Verizon calling card;
- A CLEC end user makes a call from a Verizon end user's phone and bills the call to the CLEC end user's phone number;
- A Verizon end user makes a collect call to a CLEC end user.

Verizon participates in industry "in region" and "out of region" clearinghouses for this purpose. Within the Verizon region, these calls can be handled by the New York Intrastate Access Settlement Pool as referenced in Section 6.3.1.10 above.

Outside of the Verizon region, the Centralized Message Data System (CMDS) can be used to facilitate billing and collection for these calls. CMDS is administered by Telcordia Technologies.

To obtain information on how to interface with CMDS, contact: Ron Seigle, Telcordia Technologies, at (732) 699-5082.

If the CLEC does not participate in these industry clearinghouses, then it can reach an agreement with Verizon for mutual billing and collection. (Alternate Billed Calls are also referenced in Section 6.4.4.6.)

#### **6.3.1.12 Information Service Providers**

CLECs interconnecting with Verizon may wish to make arrangements for their end users to access Information Service Providers, such as "Lottery Results" services, connected to the Verizon network. Trunking and billing arrangements must be addressed. If a CLEC does not make such arrangements for their end users to access ISP, the end user will be blocked and arrangements must be made with Verizon.

NOTE: In New York, 976 numbers are not blocked.

(Information Service Providers is also referenced in Section 6.4.4.7.)

#### **6.3.1.13 Service Control Points (SCPs) and Call Processing**

Verizon currently has four sets of call processing databases (Service Control Points - SCPs). These are AIN (Advanced Intelligent Network), LIDB (Line Information Database), 800/888 (toll free), and LNP (Local Number Portability).

Access to these SCPs for call processing requires signaling over the SS7 network (discussed in Volume III, Section 3.0) with final Global Title Translation (GTT) performed at a Verizon Signal Transfer Point (STP).

When designing the CLEC's network, a CLEC should make plans for handling these types of SCPs. CLECs may wish to consider using Verizon's SCPs. or may wish to use proprietary versions of these SCPs.

A brief discussion of each Verizon SCP is provided below; see Volume III, Section 3 for product and technical descriptions as well as pricing and USOC information. (SCPs and Call Processing is also referenced in Section 6.4.4.8 of this Volume.)

#### Advanced Intelligent Network (AIN)

The Advanced Intelligent Network SCP contains call processing programs that instruct the network on how to route or handle calls based on specific criteria (e.g., who should be charged for a call, how to handle a call if the dialed number is not available, etc.). AIN SCPs also contain information specific to individual end users. AIN SCPs are flexible databases that can accommodate multiple services developed over time.

#### Line Information Database (LIDB)

The Line Information Database is a database for alternate billing arrangements and Calling Name Feature (CNAM). LIDB queries return information about the billing and privacy features associated with the line number entries stored in the database (following an industry standard format).

#### 800/888/877 (Toll Free)

The 800/888/877 SCP processes queries for toll free number calls to determine the carrier selection and routing instructions.

#### Number Portability (NP)

In accordance with the Telecommunications Act of 1996, CLECs will make arrangements for Local Number Portability to allow the CLEC end users to retain their existing Verizon (or Other Local Service Provider (OLSP) telephone number. In turn, the CLEC needs to provide NP to enable Verizon or OLSP end users to retain their CLEC telephone number when switching service providers. Verizon currently supports "Long term" Number Portability (LNP). In accordance with the FCC's LNP order, Interim Number Portability (INP) service may no longer be ordered in Verizon and existing INP service arrangements must be transitioned to LNP as soon as possible.

See Volume III, Section 5 for more detailed number portability information.

See Volume III, Section 7.3 for information regarding ordering Number Portability (NP).

#### Local Number Portability (LNP - long term)

With LNP, subscribers keep their number when changing service providers. AIN capabilities are used to launch queries to an LNP SCP, which correlates the dialed, ported number with a new switch address.

LNP SCPs contain information about ported telephone numbers that is called a Location Routing Number (LRN). LRN provides instructions on how to route a call to a ported telephone number. LRNs are unique telephone numbers that identify specific switches in a service provider's network. The query to the LNP SCPs and identification of the LRN enables carriers to correctly route a call to a ported telephone number.

#### 6.3.1.14 Interconnections with Other Local Service Providers (OLSPs)

As stated previously, the purpose of this handbook is to provide CLECs with information regarding connecting to the Verizon network. When designing its networks, a CLEC will need to consider how it will interconnect with other CLECs or OLSPs.



In accordance with Verizon Interconnection Agreements, CLECs are required to exercise all reasonable efforts to enter into reciprocal local traffic exchange arrangements with other CLECs with which they exchange local traffic. Such arrangements are necessary regardless of whether the CLEC exchanges local traffic directly or indirectly (via Verizon's transient service) with the other CLEC.

CLECs may choose to perform many of the same steps that are covered in this handbook for each OLSP with which it wishes to interconnect, in which case, CLECs will need to contact the OLSPs directly.

CLECs purchasing unbundled switching elements from Verizon to send and receive calls to/from other carriers (OLSPs) without directly interconnecting to each OLSP may choose to use Verizon's transient tandem service for those OLSPs subtending Verizon tandems. CLECs originating such calls will be billed termination charges for the completion of their calls, which include Verizon tandem charges as well as terminating LEC charges (unless other arrangements have been made through contract or tariff). (Interconnections with OLSPs are also referenced in Section 6.4.4.9.)

#### **6.3.1.15 CLEC Responsibilities**

As the discussion above and in other parts of this Handbook shows, a CLEC will have substantial responsibilities as it works with Verizon to establish interconnection arrangements between its network and Verizon's network, and as it orders and uses Verizon UNEs and Verizon services. Meeting these responsibilities is essential for the effective interconnection of the CLEC's network to the Verizon network and its use of Verizon UNE and Verizon services. (CLEC Responsibilities is also referenced in Section 6.4.4.10.)

#### **6.3.1.16 Network Planning**

As mentioned previously, CLECs wishing to interconnect their switch to the Verizon network will need to have an understanding of each of the preceding points and will need to have cared for them in the design of the interconnected network.

In order to provide CLECs with a more detailed understanding of the points mentioned above and to verify the design of the network interconnection, CLECs need to schedule a design meeting with Verizon. The purpose of the design meeting is to allow representatives from the CLEC and Verizon to design in detail how each company's networks will interconnect. In addition, plans for the interoffice facilities that will be required will also be reviewed. With the design of the interconnected network, each company will have an understanding of the facilities required to establish the interconnection.

CLECs should obtain the materials and information discussed above prior to the design meeting and come to the meeting prepared to discuss the design of the Verizon/CLEC interconnection. In addition, CLECs should be prepared to share their initial forecasts with Verizon at this meeting.

As a guide to assist "facilities-based" CLECs with their network planning, the following is a list of the types of trunks that should be considered:

- Traffic Exchange Trunks for the transmission and routing of terminating Local Traffic, Tandem Transit Service, translated LEC IntraLATA 800/1888/1877 traffic and IntraLATA Toll Traffic.
- Access Toll Connecting (meet point billing) Trunks for the

transmission and routing of Exchange Access Traffic, including translated InterLATA 80018881877 Traffic. between CLEC Telephone Exchange Service end users and purchasers of Switched Exchange Access Service via a Verizon Tandem.

- Information Services Trunks for the transmission and routing of terminating Information Services Traffic.
- Operator Verification/Interrupt Trunks for the transmission and routing of terminating Operator Verification/Interrupt Traffic (Operator Verification/Interrupt). In Verizon-North, these trunks are called Busy Line Verification (BLV) and Busy Line Verification Interrupt (BLVI) respectively. In Verizon-South, these trunks are called Line Status Verification (LSV) and Verification of Call with Interrupt (VCI) respectively.
- 911/E911 Trunks for the transmission and routing of 911/E911 traffic.
- Directory Assistance Trunks for the transmission and routing of terminating directory assistance traffic.
- Operator Services (IntraLATA call completion) Trunks for the transmission and routing of terminating IntraLATA call completion traffic.
- Choke Trunks for traffic congestion and testing.

#### 6.3.1.17 Network Quiet Periods

In Verizon-North, CLECs should be aware of "Network Quiet Periods," which are scheduled events typically used for updating switch software and making other important changes to the network. Network quiet periods require that activity in these switches, such as customer trunk order changes or additions, be halted for a period of approximately three weeks.

In Verizon-South, quiet periods are not utilized since quiet periods only apply to 4ESS technology, which is not deployed in Verizon-South. Upgrades are performed primarily during off-hours.

The CESS Quiet Period in Verizon-North is the final three weeks of the generic retrofit schedule. It begins when the final Office Data Assembly (ODA) tape is created in the switch, sent to Lucent Technologies for error checks and updates, and is then sent back and loaded into the switch. Any recent changes made during this period (e.g., an additional unbundled trunk port purchased by the CLEC) will not be reflected in the ODA tape and must be reentered after retrofit. The ODA tape overwrites the existing changes.

Verizon will notify CLECs of the quiet period schedule for each of the tandem offices via an industry letter at least 30 days before the scheduled quiet periods, except in the event of an emergency (e.g., a service-affecting problem). If changes to the schedule are necessary, the CLECs will be notified as soon as possible. CLECs should be aware of the Verizon quiet periods. Likewise, CLECs should also communicate CLEC network quiet periods to Verizon in such cases where Verizon accesses the CLEC tandem switch.

For a schedule of Verizon-North's Network Quiet Periods, please access Verizon's web site at  
<http://128.11.40.241/east/wholesale/resources/master.htm>

#### 6.3.2 Build And Test the Network Interconnection Point

After the completion of the design meetings, each carrier will provision (i.e., build) the facilities required to establish the network

interconnection. During the building phase, there will usually be interaction between representatives from the CLEC and Verizon to ensure that the interconnection points are built per specifications. SS7 signaling will be also tested and certified.

There are many formal processes for testing various interconnection services. The SS7 certification process is described in this Section. For testing interconnection trunks, Acceptance Testing is performed at the time of trunk turn up. Refer to Section 8.5.2 in this Volume for further information on SS7 Interconnection and testing.

### **6.3.3 Establish Electronic Interface/Connectivity for Access Service Requests (ASR) and Local Service Requests (LSR)**

CLECs will be able to electronically submit requests for Access Service electronically via Network Data Mover (NDM) for most orders and for a limited type of orders via facsimile. The ASR process and format is based on industry standards commonly used by IXC's for the provisioning of IXC to LEC access service. Please refer to Volume II in this series for more information regarding NDM.

CLECs will be able to electronically submit Local Service Requests. Although LSRs will be used primarily for ordering Unbundled Network Elements, which is covered in Section 6.4. they are mentioned here due to the fact that requests for Local Number Portability (both long term and interim) are handled via the use of LSRs.

Information on getting connected to the various Verizon-North systems via EDI and other forms of electronic connectivity are contained in Volume II of this Handbook Series. Supporting documentation on the various interfaces is also available on the Verizon Wholesale Markets web site at <http://www.verizon.com/wholesale>.

Access Service Request and Local Service Request forms are industry standard forms and are available from Telcordia Technologies.

CLECs must also provide ASR (or other agreed-upon) capability for Verizon to order interconnection from the CLEC.

### **6.3.4 Conduct a Pre-ASR (Access Service Request) Meeting**

Once the network interconnection has been established, a meeting will be held between the CLEC and Verizon to review the interconnection point and the CLEC's plans for establishing the desired interconnection trunking. Additionally, Verizon will review ASR connectivity and the procedures for submitting and processing Access Service Requests (ASRs) with the CLEC.

ASRs are utilized for the ordering of interconnection trunks that enable CLECs to "build-out" their network presence and provide the range of service coverage desired.

It is important that CLECs understand the ASR process and have all of the necessary codes, forms and questionnaires (mentioned above) in order to effectively begin to request interconnection trunks. All of this information is reviewed at the Pre-ASR meeting.

The Pre-ASR meeting covers such topics as:

- Facility Architecture
- Network Architecture

- NPA/NXXs Activation Process

- 911

- Operator Services

- SS7

### 6.3.5 Establish Interoffice Trunking for the Exchange of Traffic

At this point, CLECs will submit ASRs to Verizon (and Verizon will submit ASRs to the CLEC as required) to provision the requested facilities.

For more information on the ASR process:

- See Volume II, Section 2 of this Handbook Series
- See [Section 8.2](#) of this Volume

### 6.3.6 Verify Network Build

The interconnected CLEC and Verizon networks, complete with the interoffice facilities provisioned through the ASR process, will be tested. Access to the E911 system will also be tested. The Special Test Request in the North (for testing NXXs) will be processed at this point.

Upon the successful completion of this step, a CLEC with its own switch and own local loop facilities will be able to complete calls from its own local service end users to Verizon's end users.

An important follow-up of the interconnected network design and build process is the grooming process. The grooming process will be used by the CLEC and Verizon Account Manager and their respective network planners for periodic reviews of the interconnected networks.

#### A Note on Collocation Arrangements:

CLECs wishing to interconnect with the Verizon network via collocation or to use some Verizon Unbundled Network Elements such as loopslinks, require collocation arrangements. CLECs should allow ample time to set up these arrangements. Exceptions to the collocation arrangement may apply in some jurisdictions where UNE-Platform combinations are offered.

Further information about collocation is available in [Section 6.4](#), Preparation for the Purchase of Unbundled Network Elements and the Submission of Local Service Requests and Access Service Requests.

More detailed information on various collocation arrangements and combinations is available in [Section 4](#) of Volume III.

### 6.3.7 Switched Trunk Services Customer Not Ready Policy

The Verizon Switched Trunk Services Customer Not Ready Policy is a **Four-Step** Process.

1. Confirmation Notice (CN) Due Date (DD) Plus One Day (CN DD + 1): On the day after it has been determined and verified that a customer is not ready to turn up service, a Verizon representative will contact the CLEC and request a supplemental ASR to either (a) change the due date of the requested service or (b) cancel the requested service.
2. Confirmation Notice Due Date Plus Ten Days (CN DD + 10): If a supplemental ASR is not received within 10 calendar days after the original CN due date, the Verizon representative will automatically move the due date out 21 calendar days. The Verizon representative will also

send the CLEC a letter restating the Verizon Trunk Services Customer Not Ready Policy and request a supplemental ASR to change the due date or cancel the ASR.

3. Confirmation Notification (CN) Due Date (DD) Plus Thirty-One Days (DD + 31): If a supplemental ASR is not received within 31 calendar days of the original FOC due date, the Verizon facilities (e.g., transport IOF, cross connect and trunk ports) reserved for this service will be automatically released by canceling the service order. Upon cancellation of the service order, the CLEC will renegotiate the entire interval due date of the service request. The Verizon representative will again send the CLEC a letter restating the Verizon Trunk Services Customer Not Ready Policy and stating the cancellation date.

4. Confirmation Notification (CN) Due Date (DD) Plus Sixty-One Days (DD + 61): Verizon will automatically cancel the CLEC's original ASR on the sixty-first calendar day from the original CN date. Cancellation charges will apply.

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**Attachment C**

Collocation	Quantity	MA - DTE #17		NY - PSC #8		Colorado - Qwest SGAT		Oregon	Qwest SGAT	Florida - BellSouth		Michigan - MPSC #20R	
		MRC	NRC	MRC	NRC	MRC	NRC	MRC	NRC	MRC	NRC	MRC	NRC
Physical Colo Space	10x10 Cage	\$ 356	\$ 14,066	\$ 1,230	\$ 9,993	\$ 275	\$ 51,070	\$ 663	6 1500	\$ 975	\$ 5,045	\$ 1,007	\$ 5,224
Power													
DC Power - Total	140 amp	#VALUE!	\$ -	#VALUE!	I	#VALUE!	\$	UVALUE	6	#VALUE!	\$ -	#VALUE!	\$ -
48 Volt DC Power Cable	1.1	\$ -	\$ -	\$ -	\$	6 32	\$	\$ 44	\$ 7913	\$ -	\$ -	\$ -	\$
DC Grounding		\$ -	\$ -	\$ -	\$	6 1	\$ 114	\$ 1	\$ 46	\$ -	\$ -	\$ -	\$ -
Terminations													
Voce Grade	2000	\$ -	\$ -	I 307	\$ 34,880	6 20	I 9 140	\$ 20	\$ 11 100	\$ 55	\$ 16,440	\$ 126	\$ 17,319
DS1	20	\$ -	\$ -	I 26	\$ 2,509	\$ 1	\$ 241	\$ 1	\$ 155	\$ 37	\$ 778	\$ 305	\$ 2,630
DS3		\$ -	\$ -	I 41	\$ 283	\$ 1	\$ 495	\$ 1	I 398	\$ 34	\$ 51	\$ 43	\$ 336
Total		I VALUE!	\$ 14,066	X VALUE!	\$ 17,666	I VALUE!	\$ 61,059	I VALUE	\$ 21,113	I VALUE!	\$ 22,313	I VALUE!	\$ 25,509
UNE-Loops (DSO)		MRC	NRC*	MRC	NRC	MRC	NRC**	MRC	NRC**	MRC	NRC	MRC	NRC**
zone 1		\$ 7.54	\$101711526	\$ 770	\$90113972	\$ 5.91	\$171.87/94.09	\$ 1395	126 66164 09	\$ 10.69	\$ 49.57	\$ 8.47	\$ 11.89
zone 2		\$ 14.11	\$101711526	\$ 11.31	\$90113972	\$ 12.31	\$171.87/94.09	I 2520	126 66164 09	\$ 15.20	\$ 49.57	\$ 8.73	\$ 11.89
zone 3		\$ 16.12	\$101711526	\$ 15.51	\$90113972	\$ 32.74	\$171.87/94.09	\$ 5621	126 66164 09	\$ 26.97	\$ 49.57	\$ 12.54	\$ 11.89
zone 4		\$ 20.04	\$10.17/15.26	\$ -	I	\$ -	\$ -	I	\$	\$ -	\$ -	\$ -	\$ -
Transport		MRC	NRC			MRC	NRC	MRC	NRC	MRC	NRC	MRC	NRC
DF Transport - DS3	10 Miles***	\$ 1,201	I 553	\$ 1,665	I 567	\$ 456	\$ 241	\$ 64C	I 915	\$ 1 110	\$ 335	\$ 152	\$ 714

\*Cost per Order/Cost per Line

\*\* Cost for the First Loop/Cost for Each Add'l loop per customer

\*\*\*Average Distance for Transport served by a switch in a Metropolitan LATA - Zone II pricing was used